



333 EARLE OVINGTON BOULEVARD, SUITE 402
UNIONDALE, NEW YORK 11553
T: 516-203-7600
F: 516-282-7878

December 21, 2023

Via ECF

Hon. Dale E. Ho
U.S. District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Robert Kalfus v. Premier Chess, LLC*
Docket No: 1:23-cv-07574-DEH

Dear Judge Ho:

This firm represents Plaintiff Robert Kalfus ("*Plaintiff*") in the above-referenced matter. Pursuant to Section 2(E) of Your Honor's Individual Rules & Practices, Plaintiff respectfully requests a continuance, *sine die*, of the virtual initial pretrial conference currently scheduled for January 3, 2024 at 2:00 p.m. and related deadlines.

Plaintiff makes this request as the Defendant Premier Chess, LLC ("*Defendant*") has failed to appear or answer the complaint, and is therefore in default. The Clerk's Certificate of Default was entered on November 10, 2023 (Doc. No. 12). Thereafter, Plaintiff attempted to contact Defendant via email regarding the entry of default and possible resolution of this matter and received a preliminary response from Defendant's principal. If the parties are unable to resolve, and if Defendant does not retain counsel and appear in the action, Plaintiff intends to proceed with his motion for default judgment within forty-five (45) days. Pursuant to the Individual Rules & Practices Section 2(E):

(1) the original date of the Initial Conference is January 3, 2024;

(2) no previous requests for adjournment or extension have been made;

(3) No other dates will be impacted by this request as Defendant is currently in default of answering or appearing. Further, as Defendant does not have retained counsel and is in default, Plaintiff is unable to advise whether Defendant consents to this request.



We thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ Renee J. Aragona

Renee J. Aragona

cc: all parties via ECF filing

Defendant Premier Chess, LLC

Via email to: evan@premierchess.com

Application **GRANTED**. The initial conference is **ADJOURNED** to **February 14, 2024, at 2:00 P.M. EST**. The parties shall join the conference by dialing (646) 453 - 4442 and entering the Conference ID: 830 375 014, followed by the pound sign (#). The parties shall file the required joint status letter and proposed case management plan by **February 7, 2024**. Alternatively, Plaintiff shall file its motion for a default judgment by **February 7, 2024**. So Ordered.

A handwritten signature in blue ink, appearing to read "Dale E. Ho".

Dale E. Ho

United States District Judge

Dated: December 21, 2023

New York, New York